

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

FRED MASTROIANNI, and
DOREEN MASTROIANNI,

Defendants.

AFFIRMATION

24 Mag. 4187

STATE OF NEW YORK)
COUNTY OF WESTCHESTER : ss.:
SOUTHERN DISTRICT OF NEW YORK)

RYAN ALLISON, under penalty of perjury, hereby affirms as follows:

1. I am an Assistant United States Attorney in the Southern District of New York. I submit this affirmation in support of an application for a fourth order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. § 3161(h)(7)(A).

FRED MASTROIANNI and DOREEN MASTROIANNI, the defendants, were charged with violations of 18 U.S.C. §§ 2, 371, 875(d), 2261(b)(5), and 2261A(2)(B), in a complaint dated December 4, 2024. The defendants were presented before Magistrate Judge Victoria Reznik on December 11, 2024. FRED MASTROIANNI was detained. DOREEN MASTROIANNI was released on bail conditions.

Rachel Martin, Esq., attorney for FRED MASTROIANNI, and Bruce Koffsky, Esq., attorney for DOREEN MASTROIANNI, have since been engaging in preliminary discussions with the Government concerning a possible disposition of this case without trial, and those discussions are ongoing. The Government hereby requests that a continuance of 28 days be granted, during which time we may pursue further discussions.

2. On March 25, 2025, Mr. Koffsky, counsel for DOREEN MASTROIANNI, agreed by electronic mail on behalf of DOREEN MASTROIANNI that the requested continuance of 28 days is appropriate in these circumstances.

3. On March 26, 2025, Ms. Martin, counsel for FRED MASTROIANNI, agreed by electronic mail on behalf of FRED MASTROIANNI that the requested continuance of 28 days is appropriate in these circumstances.

4. For the reasons stated above, the ends of justice served by the granting of the continuance requested outweigh the best interests of the public and defendants in a speedy trial.

5. Pursuant to Title 28, United States Code, Section 1746, I declare under penalties of perjury that the foregoing is true and correct.

Executed on April 1, 2025.



RYAN ALLISON
Assistant United States Attorney